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Allan S. McCausland, Ph.D.

CURRENT POSITION: Arbitrator/Economic Consultant

McCausland Economic Associates  
834 Main Street, P.O. Box 248  
Concord, New Hampshire 03301

McCausland Economic Associates is a consulting firm specializing in three areas:

- Arbitration, Mediation and Fact-Finding Services
- Analysis of Economic Damages and Expert Witness Work
- Financial Consulting Services

EDUCATION

Ph.D. in Economics: Clark University, Worcester, Massachusetts  
M.A. in Economics: Whittemore School of Business and Economics,  
University of New Hampshire, Durham, New Hampshire  
B.A. with High Honors, American International College, Springfield, Massachusetts

PROFESSIONAL ACTIVITY

Active Arbitrator/Mediator/Facilitator in the Private and Public Sectors  
Active Speaker/Panelist  
Consultant to Law Firms  
Financial Consultant  
Registered Investment Advisor (1983-1990)  
Professor of Economics and Finance (1969-1983)

MEMBERSHIPS

American Economic Association  
Industrial Relations and Research Association  
Eastern Economic Association  
National Academy of Arbitrators  
National Association of Business Economists  
National Association of Forensic Economists  
Northeast Business and Economic Association

PANELS

American Arbitration Association's National Panel of Labor Arbitrators  
American Arbitration Association's Multiemployer Pension Plan Amendments Act Panel  
Federal Mediation & Conciliation Service's National Roster of Arbitrators  
New Hampshire Public Employee Board's List of Neutrals  
Massachusetts Board of Conciliation and Arbitration  
Vermont Public Employee Board's List of Neutrals  
Numerous Individual Private & Public Collective Bargaining Agreements  
Defense Logistics Agency's Grievance and EEO Panels (1984-1990)  
FAANATCO-New England Region Panel of Arbitrators (1988-1993)

AFFIDAVIT

I do hereby swear and affirm the following:

I am a Ph.D. in economics. My resume is attached.

I have calculated the loss of enjoyment of life in personal injury cases, based on peer-reviewed studies in the academic economic literature on Willingness-To-Pay to save statistical lives. These studies are based on what people are willing to pay to reduce the risk of death, and what workers are willing to accept as payment for accepting such risk on the job. This methodology has been widely accepted and published in the peer-reviewed economic literature for several decades in economic journals of the highest quality.

From my personal knowledge, many of my fellow economists nationwide also testify in court as expert witnesses using this basic methodology.

Loss of enjoyment of life damages in personal injury cases can be calculated with a reasonable degree of economic certainty. These estimates can provide valuable assistance to a jury in determining intangible losses for a given individual. An example of an acceptable method to calculate such damages can be found in Economic/Hedonic Damages: A Practical Book for Plaintiff and Defense Attorneys, and supplements thereto, by M. L. Brookshire and S. V. Smith, Anderson Publishing Co., Cincinnati, Ohio, 1990.

Disagreements among economists in the forensic field in this area regarding these calculations do not materially differ from the many disagreements that exist over methodologies in other areas of economic testimony, such as valuing businesses, calculating worklife for injured workers, estimating discount rates for present value purposes, etc., where diversity of expert economic opinion has long been accepted in courts of law.

As this 18 day of December, 1996.

*[Signature]* Ph.D.

*[Signature]*

LINDA M. SHEEHY, Notary Public  
My Commission Expires March 20, 2001



Company and Paperworkers, Local 499,  
Commerce Clearing House, Inc.'s, "Labor Arbitration Awards" publication,  
iber 6, 1996, 6428, Pages 8226-8230.

of Bedford, NH Police Department and State Employees Association of New Hampshire. The Bureau of National Affairs, Inc.,  
Relations Reporter" publication, August 21, 1996. 1061-A967-970.

Whole and Statutory Remedies: The Displaced Employees Arbitration 1995: New Challenges and Expanding Responsibilities.  
 reat of National Affairs, Inc., pages 191-205.

**and** **Arbitration/United Paper Workers International, Local 900, Commerce Clearing House, Inc.'s, "Labor Arbitration"**  
**Publication, October 18, 1994, 94-2 ARS4483.**

Local County Commissioners (N.H.) and AECSCME Local 2715. The Bureau of National Affairs, Inc., "Labor Relations" Publication, March 2, 1994, 101A1033-1064, also published by Commerce Clearing House, "Labor Arbitration Awards" 100, May 17, 1994, 94-1 ARB44221.

1 (U) School District and Conway Education Association, American Arbitration Association's "Arbitration in the Schools" (December 1, 1991).

real, 388 and City of Holyoke, Commerce Clearing House, "Labor Arbitration Awards" publication, March 12, 1991, 91-1  
 real, 388 and City of Holyoke, Commerce Clearing House, "Labor Arbitration Awards" publication, May 15, 1991 Vol. 21 No. 5.  
 real, 388 and City of Holyoke, Commerce Clearing House, "Labor Arbitration Awards" publication, March 12, 1991, 91-1

Ampl (MA) and International Brotherhood of Police Officers, Local 415, American Arbitration Association's "Labor and Government" publication, September 15, 1988.

City (NH) School Distric(AFSOME Council 93, Local 180), American Arbitration Association's "Arbitration in the Schools" on February 1, 1987.

© NEA School District/National Education Association-New  
© Merrimack Educational Support Staff, Labor Relations Press™ "Labor Arbitration Information System" publication, October

Town of Goffstown (NH)/AFSCME Council 93, Local 2715, American Arbitration Association's "Labor Arbitration in the Government" publication, April 15, 1986.

~~North Smithfield (RI) School Committee/North Smithfield Association of Support Staff Personnel/National Education Association-Rhode Island, American Arbitration Association's "Arbitration in the Schools" publication, September 1, 1985.~~

Using Statistics to Assess Affirmative Action, Papers and Proceedings, New England Business and Economic Association, Fall 1982

Minimum Wage Employment Effects In New England: 1950 through 1972, Papers and Proceedings, New England Business and Economic Development Conference, Fairfield, Connecticut, 1976

**The Fair Labor Standards Amendments of 1975 (H.R. 10130). FAIR LABOR STANDARDS AMENDMENTS OF 1975.** Hearings before the Subcommittee on Labor Standards of the Committee on Education and Labor, House of Representatives, Ninety-Fourth Congress, pages 246-248. November 1975.

PREVIOUS PROFESSIONAL EXPERIENCE

1983-Present Arbitrator/Economic Consultant, McCausland Economic Associates

1974-1983 Professor Economics and Finance

New Hampshire College  
Manchester, New Hampshire

Duties: Taught Investments, Security Analysis,  
Labor Economics, Labor Relations and  
Arbitration, Introduction to Economics.

Special Economic Consultant to Public Service  
Company of New Hampshire for the development  
of Labor Supply Availabilities for minorities  
and for statistically assessing progress  
in the Company's Affirmative Action Program.

Chairman: Management Arts and Economic Sciences  
Department, New Hampshire College

Duties: Supervised faculty, students and  
curriculum development in the following  
majors: Economics, Finance, Fashion Merchandising,  
Hotel/Resort Management, Marketing,  
Retail Management, and Techno-Business.

Associate Consultant, New England Economic Project  
Aided in the development of a New England  
Forecasting Model and advised the Directors in  
policy decisions concerning the Project's  
activities.

Adjunct Professor of Investments and Personal Finance,  
Merrimack Valley Branch, University of New Hampshire,  
Manchester, New Hampshire

Duties: Developed curriculum and taught Investments  
and Personal Finance.

Assistant Professor of Economics and Finance

Coordinator: Economics and Finance Area  
New England College, Henniker, New Hampshire

Duties: Taught Investments, Labor Economics,  
Labor Relations and Arbitration, Intermediate  
Micro and Macro Economics, and Introduction to  
Economics.

COURT APPEARANCES AS AN ECONOMIC EXPERT\*

**MAINE**

Federal District Court of Maine, Portland and Bangor, Maine  
- Business Lost Income and Sales, Business Valuations  
- Economic Losses Resulting from Personal Injury, Defamation  
and Wrongful Discharge/Discrimination

State of Maine Superior Court: Cumberland, Kennebec, Knox, Oxford and Sagadahoc Counties  
- Business Valuations  
- Economic Losses Resulting from Personal Injury

**MASSACHUSETTS**

Federal District Court of Massachusetts, Boston, Massachusetts  
- Business Lost Income and Sales, Business Valuations  
- Economic Losses Resulting from Personal Injury and Wrongful  
Discharge/Discrimination

State of Massachusetts Superior Courts: Essex, Middlesex, Norfolk,  
Plymouth, Suffolk and Worcester Counties  
- Economic Losses Resulting from Personal Injury  
- Limited Partnership Valuations

**NEW HAMPSHIRE**

Federal District Court of New Hampshire, Concord, New Hampshire  
- Business Lost Income and Sales, Business Valuations  
- Economic Losses Resulting from Personal Injury, Wrongful  
Discharge/Discrimination and Wrongful Death

State of New Hampshire Superior Courts: Cheshire, Coos, Grafton, Hillsboro,  
Merrimack, Rockingham, Strafford, and Sullivan Counties  
- Business Lost Income and Sales, Business Valuations  
- Economic Losses Resulting from Personal Injury, Wrongful  
Death and Wrongful Discharge/Discrimination

**VERMONT**

State of Vermont Superior Court: Orange County  
- Economic Losses Resulting from Wrongful Discharge

\* This is a list of the courts in which I have testified. I have testified  
in many of these courts numerous times on the same issues.